

US EPA RECORDS CENTER REGION 5



487126

December 2, 1980

Commander K. F. Wassenberg  
U. S. Coast Guard  
Captain of the Port  
Marine Safety Office  
477 Michigan Avenue, Room 550  
Detroit, Michigan 48226

Dear Commander Wassenberg:

This letter is in response to your letter of November 5, 1980 regarding the BASF Wyandotte (Federal Marine Terminals) site located in Riverview, Michigan. It is the opinion of the U. S. Environmental Protection Agency (USEPA) that the course of action indicated in the following recommendations presents the best response to the conditions encountered at the BASF site as known at this time.

The first aspect of the hazardous conditions at the BASF site which is of concern is the runoff of contaminated surface water from the site to the Detroit River. This surface water runoff was clearly evident during the Regional Response Team meeting on August 21, 1980. On that date USEPA recommended that Section 311 funds be utilized to contain this runoff. It was apparent at the RRT meeting that interim containment of the runoff could be accomplished with materials located on the site at a reasonable cost.

Pursuant to Section 311(c)(1) of the Clean Water Act, 33 U.S.C. § 1321(c)(1), "Whenever any oil or a hazardous substance is discharged, or there is a substantial threat of such discharge, into or upon the navigable waters of the United States ... the President is authorized to act to remove or arrange for the removal of such oil or substance at any time ...." There is no requirement that a reportable quantity of any pollutant be shown to have actually entered the Detroit River. In addition, 40 CFR § 1510.53 requires that "Defensive actions should begin as soon as possible after a discharge or potential discharge is discovered." Therefore, in light of the health hazards associated with the obvious discharge of surface runoff to the Detroit River and the continued threat of such discharge USEPA renews its recommendation that 311 funds be used immediately to contain further runoff from the BASF site. The second aspect of concern associated with the site is the movement of contaminated ground water from the site to the Detroit River.

The continuing discharge of contamination from the BASF site to the Detroit River via ground water flow has been documented, however, the exact nature of the discharge is unknown at this time. In order to fully assess the characteristics of the ground water movement USEPA is planning to undertake a complete hydrogeologic study of the site. The funding for this study was recently approved and the necessary field work should be completed prior to the end of December 1980. The results of this study will provide us with an assessment of the remedial actions needed to remove the hazards associated with the site. Until this study is complete it is impossible to prescribe a complete and effective remedial program. Recommendations concerning the long-term remedy for the hazards at this site or the potential necessity for the further use of Section 311 funding, as well as any conclusive assessment of the conditions at the site are clearly premature at this time.

In summary, USEPA recommends that Section 311 funds be used immediately to contain surface runoff from the BASF site. Further remedial actions and conclusions regarding the conditions at the site, however, must wait until the completion of the hydrogeologic study. Please feel free to contact me should you have any questions or comments regarding these recommendations.

Sincerely yours,

Richard E. Bartelt  
Chief, Environmental Emergency and  
Investigations Branch

cc: Vanderlaan  
Bartelt  
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GAVanderlaan/REBartelt/dg